

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LUANN P. GOULD,

Plaintiff,

— against —

LUCENT TECHNOLOGIES, INC.,

Defendant.

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**THE PARTIES' JOINT MOTION TO ADJOURN  
THE TRIAL AND OTHER RELATED DATES**

Undersigned counsel for Plaintiff and Defendant jointly move this Court to adjourn the trial that is currently scheduled in this matter for October 30, 2006, along with other deadline dates to submit certain pretrial documents in connection therewith.

Under Court’s current scheduling order, parties are required to submit documents as follows:

- (1) time to serve/file objections to pretrial disclosures: September, 25, 2006.
- (2) time to serve/file proposed jury instructions, proposed voir dire, motions in limine, witness/exhibit lists, and any designations of deposition testimony: September 28, 2006.
- (3) extend the time to file joint pretrial memorandum: October 4, 2006.
- (4) time to serve/file opposition to motions in limine, objections to witness/exhibit lists and counter designation of deposition testimony: October 4, 2006.

Counsel for both parties jointly request that the Court adjourn these dates in light of Defendant Lucent Technologies, Inc.'s ("Lucent") pending motion for summary judgment. Because there is a likelihood Defendant's motion may dispose fully of this case, or at least significantly narrow the issues for trial, it may be an unnecessary expenditure of time, money and judicial resources to prepare for trial at this time.

Should Lucent's motion be denied, Counsel jointly propose that the Court adjourn the trial date for a reasonable period of time after the Court's determination of Lucent's motion for summary judgment in order to prepare for trial and submit all necessary documents to the Court in connection therewith.

WHEREFORE, Counsel jointly respectfully request that the Court grant this motion to adjourn for a period for so long as the Court may determine necessary in light of the reasons given herein for the adjournment.

**EPSTEIN, BECKER & GREEN, PC**

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Dated: September 20, 2006